

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as  
Administrators of the Estate of LOUIS  
JUNG, JR,

Plaintiff,

v.

CITY OF PHILADELPHIA; YesCare Corp.;  
BLANCHE CARNEY, Former  
Commissioner of Philadelphia Dept. of  
Prisons; LALITHA TRIVIKRAM;  
MAUREEN GAY; Correctional Officer John  
Does 1-10,

Defendants.

No. 2:24-cv-05618-TJS

**JURY TRIAL DEMANDED**

**CERTIFICATE OF MERIT**

I, Bret Grote, Esquire, certify that:

An appropriate licensed physician and expert in diabetes care, Louis Phillipson, M.D., Ph.D, has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by defendant Dr. Lalitha Trivikram in the above-captioned action in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm.

Respectfully submitted,

*/s/ Bret Grote*

Bret Grote

PA I.D. No. 317273

Abolitionist Law Center

990 Spring Garden

Philadelphia, PA 19123

(412) 654-9070

[bretgrote@abolitionistlawcenter.org](mailto:bretgrote@abolitionistlawcenter.org)